

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	
	)	Chapter 7
SANDRA FREEMAN	)	
	)	
	)	
	)	Case No. 06-08030
Debtor	)	
	)	
	)	Honorable Judge Bruce W. Black

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**NOTICE OF MOTION**

TO: Ocwen Loan Servicing, LLC, ATTN: Ronald M. Faris, President and Chief Executive Officer, 1661 Worthington Road, Suite 100, West Palm Beach, FL 33409 (via U.S. Certified Mail)  
Patrick S. Layng, Office of the United States Trustee (via ECF)  
Bradley Waller, Chapter 7 Trustee (via ECF)  
All Creditors Listed on the Attached Service List (via U.S. Mail)

PLEASE TAKE NOTICE that on January 15, 2016 at 9:00 AM, the undersigned will appear before the Honorable Bruce W. Black at the Joliet City Hall, located at 150 W. Jefferson Street, 2nd Floor, Joliet, Illinois 60432, and will then and there present the attached **Debtor's Motion to Reopen Chapter 7 Case**, at which time you may appear if you so choose.

**Certificate of Service**

I, Mohammed O. Badwan, hereby certify that I caused a copy of this notice and attached Motion to be served, via ECF to Patrick S. Layng (United States Trustee) and Bradley Waller (Chapter 7 Trustee), via U.S. Certified Mail to Ocwen Loan Servicing, LLC, ATTN: Ronald M. Faris, President and Chief Executive Officer, and via standard U.S. Mail to all creditors listed on the attached service list on December 28, 2015, before the hour of 5:00 p.m. from the office located at 900 Jorie Blvd., Ste 150, Oak Brook, IL 60523.

**By: /S/ Mohammed O. Badwan**  
**Sulaiman Law Group, Ltd.**  
*Counsel for Debtors*  
900 Jorie Blvd., Suite 150  
Oak Brook, Illinois 60523  
Phone: (630) 575-8181  
Fax: (630) 575-8188  
Attorney Number 6299011

ADI  
9745 Industrial Dr.  
Bridgeview, IL 60455  
Oak Brook, IL 60523

American Mtg  
PO Box 631730  
Irving TX 75063-0002

Ameri Credit  
801 Cherry St. #3990  
Ft. Worth, TX 76102

Blitt & Gaines  
318 W. Adams St.  
Chicago, IL 60606

Capital One  
PO Box 30285  
Salt Lake City, UT 84130

Calvary Portfolio Services  
500 Summit Lake Drive  
Valhalla, NY 10595

Dun Demand  
4836 Breckville Rd  
Richfield, OH 44286

Z-Tell  
401 Brock Dr.  
Bloomington, IL 61701

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
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In Re:	
SANDRA FREEMAN	NO. 06-08030
Debtor	Chapter 7
	Honorable Judge Bruce W. Black

**DEBTOR'S MOTION TO REOPEN CHAPTER 7 CASE**

**NOW COMES** the Debtor, SANDRA FREEMAN ("Debtor"), by and through her attorneys, SULAIMAN LAW GROUP, LTD., and pursuant to 11 U.S.C. §350 bringing this Motion To Reopen Chapter 7 case, and in support thereof, stating as follows:

1. On July 7, 2006, Debtor filed a Chapter 7 petition in the United States Bankruptcy Court, Northern District of Illinois, Case Number 06-08030.

3. On December 18, 2006, Debtor was granted a discharge of all dischargeable debts pursuant to 11 U.S.C. § 727.

4. Despite Debtor's discharge and the broad prohibition to cease collection activity on a discharged debt, Ocwen Loan Servicing, LLC ("Ocwen") has continued to harass the Debtor for payment on a discharged debt for the last 2.5 years. Debtor has advised Ocwen of her discharge and has demanded that the collection activity cease on at least 360 occasions. However, Ocwen continues its collection efforts in blatant disregard to the protections provided by the Discharge Injunction. *See* Debtor's Motion Pursuant to 11 U.S.C. § 524 for Violations of the Discharge Injunction filed simultaneously with this motion.

5. Debtor has been denied the relief afforded by the Discharge Injunction and continues to be harmed by Ocwen's unlawful conduct.

6. Debtor cannot proceed in her action seeking relief without the reopening of this case.

**WHEREFORE,** Debtor respectfully prays that this Honorable Court enter an order directing the Clerk to reopen Debtor's case for the sole purpose of adjudicating Debtor's Motion Pursuant to 11 U.S.C. § 524 for Violations of the Discharge Injunction Against Ocwen Loan Servicing, LLC, and for any other relief that this Honorable Court may deem just and proper.

Dated: December 28, 2015

Respectfully Submitted,

/s/ Mohammed O. Badwan  
Mohammed O. Badwan, Esq. #6299011  
*Counsel for Debtor*  
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